

***DAVIS, PARRY, TYLER & WRIGHT***

By: Christopher H. Wright, Esquire

Attorney I.D. No.: 27091

1525 Locust Street, 14<sup>th</sup> Floor

Philadelphia, PA 19102

(215) 732-3755

Attorney for Defendant Verizon

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***IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

**KATHY L. OAKES**

:

**Civil Action No. 02-2749**

:

**vs.**

:

:

**HENKELS AND McCOY, et al**

:

***ANSWER OF DEFENDANT, VERIZON (FORMERLY KNOWN  
AS BELL ATLANTIC) TO CROSSCLAIM OF CITY OF PHILADELPHIA***

Denied. Verizon Pennsylvania Inc. specifically denies that it has liability to the Plaintiff or has liability by way of contribution and/or indemnification to any of the Co-Defendants.

WHEREFORE, Verizon Pennsylvania Inc. requests judgment in its favor.

***DAVIS, PARRY, TYLER & WRIGHT***

By: \_\_\_\_\_

**CHRISTOPHER H. WRIGHT, ESQUIRE**

**Attorney for Defendant, Verizon**

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**CERTIFICATE OF SERVICE**

I, **Christopher H. Wright, Esquire**, hereby certify that a true and correct copy of the foregoing *Answer of Defendant, Verizon (formerly known as Bell Atlantic) to Crossclaim of City of Philadelphia* was served on the following counsel of record and unrepresented parties by first class U.S. mail, postage prepaid:

Dennis E. Block, Esquire

***Block & Gatusso***

Washington Professional Campus

900 Route 168, Suite H1

Turnersville, NJ 08012

Attorney for Plaintiff

Andrew L. Salvatore, Esquire

***Kelly, McLaughlin, Foster, Bracaglia,***

***Daly, Trabucco & White***

1617 J. F. Kennedy Blvd., Suite 1690

Philadelphia, PA 19103-1815

Attorney for Henkels & McCoy

Robert C. Mickle, Jr., Esquire

***Kennedy, Walker & Lipski***

1818 Market Street, Suite 2510

Philadelphia, PA 19103

Attorney for Danella Construction Co.  
& Level 3 Communications

Conrad O. Kattner, Esquire

***PECO Energy Co. Legal Department***

2301 Market Street, P.O. Box 8699

Philadelphia, PA 19101-8699

Attorney for PECO Energy Company  
/ Exelon Communications

Kenneth S. Butensky, Esquire

***City of Philadelphia Law Department***

One Parkway

1515 Arch Street

Philadelphia, PA 19102

Attorney for City of Philadelphia

John O.J. Shellenberger, Esquire

***Office of Attorney General***

21 S. 12<sup>th</sup> Street, 3<sup>rd</sup> Floor

Philadelphia, PA 19107-3603

Attorney for Pennsylvania Department  
of Transportation

Colette A. Pete, Esquire  
***Philadelphia Gas Works***  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

Attorney for Philadelphia Gas Works

***DAVIS, PARRY, TYLER & WRIGHT***

***By:*** \_\_\_\_\_  
**CHRISTOPHER H. WRIGHT, ESQUIRE**  
**Attorney for Defendant, Verizon**

Date: July 29, 2002